

**Lands with Wilderness Characteristics Report:**  
**Road Gulch**  
**COF-020-076**

Section 201 of FLPMA requires the BLM to maintain on a continuing basis an inventory of all public lands and their resources and other values, which includes wilderness characteristics. It also provides that the preparation and maintenance of the inventory shall not, of itself, change or prevent change of the management or use of public lands. Regardless of past inventory, the BLM must maintain and update as necessary, its inventory of wilderness resources on public lands. In some circumstances conditions relating to wilderness characteristics may have changed over time, and an area that was once determined to lack wilderness characteristics may now possess them. BLM Manual 6310 'Conducting Wilderness Characteristics Inventory on BLM Lands' provides the guidance on conducting this inventory process.

Following BLM guidance the Royal Gorge Field Office conducted an inventory in 2013 and found the 3,161.1 acre unit did not meet the criteria for having wilderness characteristics. Per policy, the public has the opportunity to provide new information regarding wilderness characteristics that the BLM must evaluate and consider. New information that meets the minimum standard for further review was submitted by Wild Connections on May 6, 2015 contending that the unit did in fact meet the criteria. This report reflects an updated inventory that combines BLM's 2013 findings and an evaluation of the data submitted by Wild Connections.

<b>Inventory Effort</b>	<b>Acreage Inventoried</b>	<b>Wilderness Characteristics Acreage</b>
BLM 2013 Inventory	3,161.1	0
Wild Connections Inventory	3,161.1	3,161.1
BLM 2015 Evaluation Conclusions	3,161.1	0

## Form 1: Document Wilderness Characteristics Inventory Findings on Record (Refers to Original 1980's Inventory Effort)

Is there existing BLM wilderness characteristics inventory information on all or part of this area?

NO   X   (If no, go to form 2)

YES        If yes, and if the area has subunits within the broader area, list the unique identifiers for each of those subunits:

Inventory Source:

Inventory Area Unique Identifier(s): 012-001

Map Name(s)/Number(s): \_\_\_\_\_

BLM District(s)/Field Office(s): Front Range District/ Royal Gorge Field Office

BLM Inventory findings on record: Document existing inventory information regarding wilderness characteristics (if more than one BLM inventory area is associated with the area, list each area and answer each question individually for each inventory area):

Document BLM Wilderness Characteristics Findings on Record (Historic Findings)					
Inventory Source Document:					
Area Unique Identifier	Sufficient Size? (YES/NO & acres)	Naturalness (YES/NO)	Outstanding Opportunities for Solitude (YES/NO)	Outstanding opportunities for primitive & unconfined recreation (YES/NO)	Supplemental Values? (YES/NO)

(add rows as needed)

## Form 2: Current Conditions: Presence or Absence of Wilderness Characteristics

Area Unique Identifier: CO-020-076, Road Gulch

Acreage: 3,161.1 acres

1. Is the area of sufficient size? :

Yes   X   No       

The land is smaller than 5,000 acres but is contiguous with the BLM McIntyre Gulch Wilderness Study Area (WSA) (managed by the Royal Gorge Field Office BLM) meeting the size exception 2.a.i.

The unit, CO-020-076, is bounded as follows:

- Bureau of Land Management McIntyre Hills WSA on the north edge;
- The west edge is bounded by wilderness inventory road, Colorado State Hwy 69;
- Three wilderness inventory roads were identified and cherry stemmed from the unit, BLM 6161, BLM 6161-A and BLM 6161-B.
- The south edge is bounded by wilderness inventory road, Fremont County Road 28;
- The south east corner is bounded by wilderness inventory road, BLM 6162.
- The east edge is bounded by property lines other than BLM management.

The BLM's 2013 inventory found the area to have sufficient size to meet the minimal criteria but concluded it did not appear natural due to cumulative impacts of man-made features, most notably a designated road network occupying the center section of the unit. In 2015 the BLM reviewed these findings and policy. The area is smaller than 5,000 acres and is contiguous with the BLM McIntyre Hills Wilderness Study Area (WSA) (managed by the Royal Gorge Field Office BLM). According to the policy in BLM Manual 6310, a size exception 2.a.i. could be used if the area is Roadless. However there are 7.2 miles of wilderness inventoried roads documented within the unit. These roads were designated as routes open to the public and are maintained. Although the routes do not receive regular and continuous use; they are prevalent throughout the area. The report submitted by Wild Connections does not contend that these are wilderness inventory roads and proposed to cherry stem the routes out of the unit. The BLM concludes that this unit does not meet the road-less criteria and the unit was not considered further.

2. Does the area appear to be natural?

Yes        No        NA   X  

Description: N/A

3. Does the area (or the remainder of the area if a portion has been excluded due to unnaturalness and the remainder is of sufficient size) have outstanding opportunities for solitude?

Yes\_\_\_\_ No\_\_\_\_ NA X

Description: N/A

4. Does the area (or the remainder of the area if a portion has been excluded due to unnaturalness and the remainder is of sufficient size) have outstanding opportunities for primitive and unconfined recreation?

Yes\_\_\_\_ No\_\_\_\_ NA X

Description:  
N/A

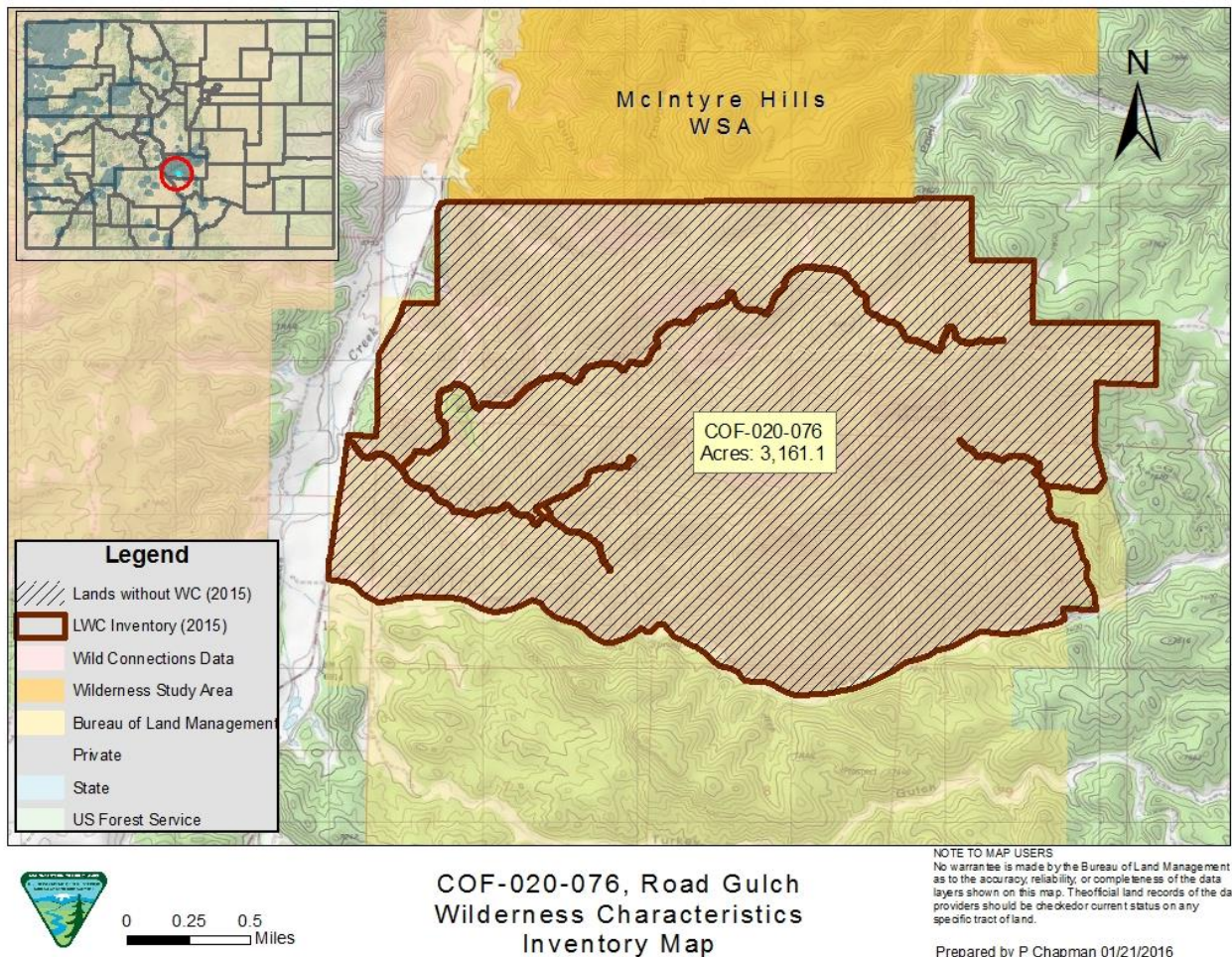
5. Does the area have supplemental values?

Yes X No\_\_\_\_ NA\_\_\_\_

Description:

- The unit is within a bighorn sheep production area, bighorn sheep severe winter range, and elk and mule deer winter range as mapped by Colorado Parks and Wildlife.

## Map 1 Road Gulch 2015 Inventory



## Summary of Analysis:

Unique Identifier: COF-020-076, Road Gulch

Acreage: 3,161.1 acres

### Results of Analysis:

The BLM's 2013 inventory found the area to have sufficient size to meet the minimal criteria but concluded it did not appear natural due to cumulative impacts of man-made features, most notably a designated road network occupying the center section of the unit. These roads were designated in the Arkansas River Travel Management Plan and meet the criteria for being wilderness inventory roads.

Wild Connections submitted information in 2015 contending that the unit did in fact have wilderness characteristics. Their report removed the routes from the defined unit as a cherry stem. In 2015, the BLM reviewed the information submitted by Wild Connections along with past inventory efforts and policy. Wild Connections report indicates that these cherry stem roads are not visible because they generally follow gulches and natural linear features. BLM Manual 6310 identifies that areas must meet a minimal criteria of being a roadless area over 5,000 acres. The 7.2 miles of designated roads cut through the central portion of the Road Gulch unit and cover a large area in relation to the unit's overall size.

Based on a review of BLM policy and Wild Connections data, the BLM concludes that the unit does not meet the minimum size criteria based on the fact that the area is not truly Roadless. Therefore the unit does not possess wilderness characteristics.

The unit, CO-020-076, is bounded as follows:

- Bureau of Land Management McIntyre Hills WSA on the north edge;
  - The west edge is bounded by wilderness inventory road, Colorado State Hwy 69;
  - Three wilderness inventory roads were identified and cherry stemmed from the unit, BLM 6161, BLM 6161-A and BLM 6161-B.
  - The south edge is bounded by wilderness inventory road, Fremont County Road 28;
  - The south east corner is bounded by wilderness inventory road, BLM 6162.
  - The east edge is bounded by property lines other than BLM management.
  - The unit is found in parts of the sections listed in the following townships;
    - o T. 19 S. R. 73 W. Sections 31, 32, and 33
    - o T. 20 S. R. 73 W. Sections 4, 5, and 6.
- 
- Does the area meet size requirements or exceptions? Yes   X   No
  - Does the area appear natural? Yes        No        NA   X
  - Does the area offer outstanding opportunities for solitude or a primitive and unconfined type of recreation? Yes        No        NA   X
  - Does the area have supplemental value? Yes   X   No        NA

Check one:

- ☐ The area, or a portion of the area, has wilderness characteristics and is identified as land with wilderness characteristics.
- ☒ The area does not have wilderness characteristic.

This does not represent a formal land use allocation or a final agency decision, and does not represent a decision in regard to how the area will be managed or address impacts of management decisions.

Prepared by:

Evaluator: Janine Prout/ Recreation Technician  
Evaluator: Kalem Lenard/ Outdoor Recreation Planner  
Evaluator: Matt Rustand/Wildlife Biologist  
Evaluator: Linda Skinner/ Outdoor Recreation Planner

Date: May 30, 2013  
Date: June 28, 2013  
Date: Sept 11, 2013  
Date: December 28, 2015

### **Form 3: Route Analysis:**

The Route Analysis includes factors to consider when determining whether a route is a road for wilderness characteristics inventory purposes. For the purposes of this analysis, use the following definition of a "road". This definition is drawn from and the FLPMA legislative history and historic BLM inventory direction.

Road: An access route which has been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road.

- a. Improved and maintained – Actions taken physically by people to keep the road open to vehicle traffic. “Improved” does not necessarily mean formal construction. “Maintained” does not necessarily mean annual maintenance.
- b. Mechanical means – Use of hand or power machinery or tools.
- c. Relatively regular and continuous use – Vehicular use that has occurred and will continue to occur on a relatively regular basis. Examples are: access roads for equipment to maintain a stock water tank or other established water sources, access roads to maintained recreation sites or facilities, or access roads to mining claims.

If a portion of a route is found to meet the wilderness inventory road criteria (see Part III) and the remainder does not meet these criteria (e.g., a cherry stem road with a primitive route continuing beyond a certain point), identify each segment and explain the rationale for the separate findings.

Wilderness Characteristics Inventory Area Unique Identifier: COF-020-076

Route or Route Segment Name and/or Identifier: Colorado State Hwy 69, BLM 6161, BLM 6161-A, BLM 6161-B, Fremont County Road 28, and BLM 6162.

**I. LOCATION:**

Refer to attached map and BLM corporate data (GIS). List photo point references (where applicable) or reference attached photo log:

Map Title: Unit, COF-020-076 Wilderness Inventory Map

Map Date: 2013

Describe:

The map shows the parcel inventoried for wilderness characteristics, and routes collected by GPS

**II. ROUTE CONTEXT**

The purpose of a route is not a deciding factor in determining whether a route is a road for wilderness characteristics inventory purposes. The purpose of a route does provide context for factors on which such a determination may be based, particularly the question of whether maintenance of the route ensures relatively regular and continuous use. The purpose also helps to determine whether maintenance that may so far have been unnecessary to ensure such use would be approved by BLM when the need arises.

**A. Current Purpose of Route:**

Describe:

- Colorado State Hwy 69: transportation use.



- BLM 6161 is used for recreational use and rangeland improvement projects.
- BLM 6161 A is used for recreational use and rangeland improvement projects.
- BLM 6161-B is used for recreational use and rangeland improvement projects.
- Fremont County Road 28 is used for general transportation.
- BLM 6162: is used open tot full size vehicle use, mostly used for recreational purposes and access to vegetation treatment projects.

B. Right-of-Way (ROW):

B.1. Is there a ROW associated with this route?

Yes X No    Unknown   

If yes, what is the stated purpose of the ROW?

- Colorado State Hwy 69: has a ROW association to the state, serial #: 059935 60'transportation use.
- Fremont County Road 28 has a ROW association; serial #44142, the ROW is still in use.
- 

B.2. Is the ROW still being used for this purpose?

Yes X No    Unknown or N/A   

Explain:

Yes, the above stated routes have the ROWs still in use.

III. WILDERNESS INVENTORY ROAD CRITERIA

A. Is there evidence of construction or improvement using mechanical means?

Yes, if either III.A.1 *or* III.A.2 is checked "yes" below   X  

No, if both III.A.1 *and* III.A.2 are checked "no" below   

A.1. Construction: Is there evidence that the route or route segment was originally constructed using mechanical means?

Yes   X   No   

Describe:

- Colorado State Hwy 69: is paved
- BLM 6161 was mechanically constructed, evidence of cut/ fill on the hill sides.
- BLM 6161 A was mechanically constructed, evidence of cut/ fill on the hill sides.
- BLM 6161-B was mechanically constructed, evidence of cut/ fill on the hill sides.
- Fremont County Road 28 was mechanically constructed, graveled.
- BLM 6162: was mechanically constructed, evidence of cut/ fill on the hill sides.

A.2. Improvements: Is there evidence of improvements using mechanical means to facilitate access?

Yes   X   If "yes", improvements by? Hand Tools    by Machine   X

No \_\_\_\_\_

Describe:

- Colorado State Hwy 69: has evidence of mechanical improvements
- BLM 6161 has no evidence of recent improvements.
- BLM 6161 A has no evidence of recent improvements.
- BLM 6161-B has no evidence of recent improvements.
- Fremont County Road 28 has evidence of mechanical improvements, drainage features installed and culverts.
- BLM 6162 has evidence of recent mechanical improvements to access vegetation treatment projects.

B. Maintenance: Is there evidence of maintenance that would ensure *relatively* regular and continuous use?

Yes, if either III.B.1 *or* III.B.2 is checked "yes" below  X

No, if both III.B.1 *and* III.B.2 are checked "no" below \_\_\_\_\_

- Colorado State Hwy 69: maintained for regular and continuous use
- BLM 6161 is maintained for full size vehicle access.
- BLM 6161 A is maintained for full size vehicle access.
- BLM 6161-B is maintained for full size vehicle access.
- Fremont County Road 28 is maintained for regular use.
- BLM 6162 is maintained for full size vehicle access.

B.1. Is there evidence or documentation of maintenance using hand tools or machinery?

Yes  X  If "yes", maintenance by? Hand Tools \_\_\_\_\_ by Machine  X

No \_\_\_\_\_

Explain:

- Colorado State Hwy 69 is maintained by machinery.
- BLM 6161 is maintained mechanically for full size vehicle access.
- BLM 6161 A is maintained mechanically for full size vehicle access.
- BLM 6161-B is maintained for full size vehicle access.
- Fremont County Road 28 is maintained regularly for general transportation
- BLM 6162 is maintained to ensure full size vehicle use.

B.2. If the route or route segment is in good condition, but there is no evidence of maintenance, would mechanical maintenance with hand tools or machines be approved by BLM to meet the purpose(s) of the route in the event this route became impassable? "Good condition" would be a condition that ensures regular and continuous use relative to the purposes of the route. Consider whether the route can be clearly followed in the field over its entire course and whether all or any portion of the route contains any impediments to travel.

Yes  X  No \_\_\_\_\_

Explain:

- Colorado State Hwy 69 would be maintained by the Colorado Department of Transportation
- BLM 6161: BLM would maintain route if became impassable.
- BLM 6161 A BLM would maintain route if became impassable.
- BLM 6161-B BLM would maintain route if became impassable.
- Fremont County Road 28 would be maintained by Fremont County
- BLM 6162 BLM would maintain route if became impassable.
- 

C. Relatively regular and continuous use: Does the route or route segment ensure relatively regular and continuous use?

Yes   X   No       

Explain: Describe evidence (e.g., direct: vehicles or vehicle tracks observed; or indirect: evidence of use associated with purpose of the route such as maintenance of facility that route accesses) and other rationale for whether use has occurred and will continue to occur on a *relatively* regular basis (regular and continuous use relative to the purpose(s) of the route). Include estimate of travel rates for the stated purposes (e.g., trips per day, week, month, season, year, or even multiple years in some facility maintenance cases).

- Colorado State Hwy 69 has regular and continuous use, use occurs daily.
- BLM 6161: does not receive regular use.
- BLM 6161 A does not receive regular use.
- BLM 6161-B does not receive regular use.
- Fremont County Road 28 has regular and continuous use, use occurs daily.
- BLM 6162 does not receive regular use.

#### IV. CONCLUSION:

Does the route or route segment meet the definition of a wilderness inventory road (i.e., are items III.A *and* III.B *and* III.C all checked yes)? If part of the route meets the wilderness inventory road definition and the remainder does not, describe the segment meeting the definition and any remaining portion not meeting the definition and why. Also, describe and explain rationale for any discrepancies with citizen proposals.

Yes   X   = Wilderness Inventory Road

No        = Not a road for wilderness inventory purposes

Explain:

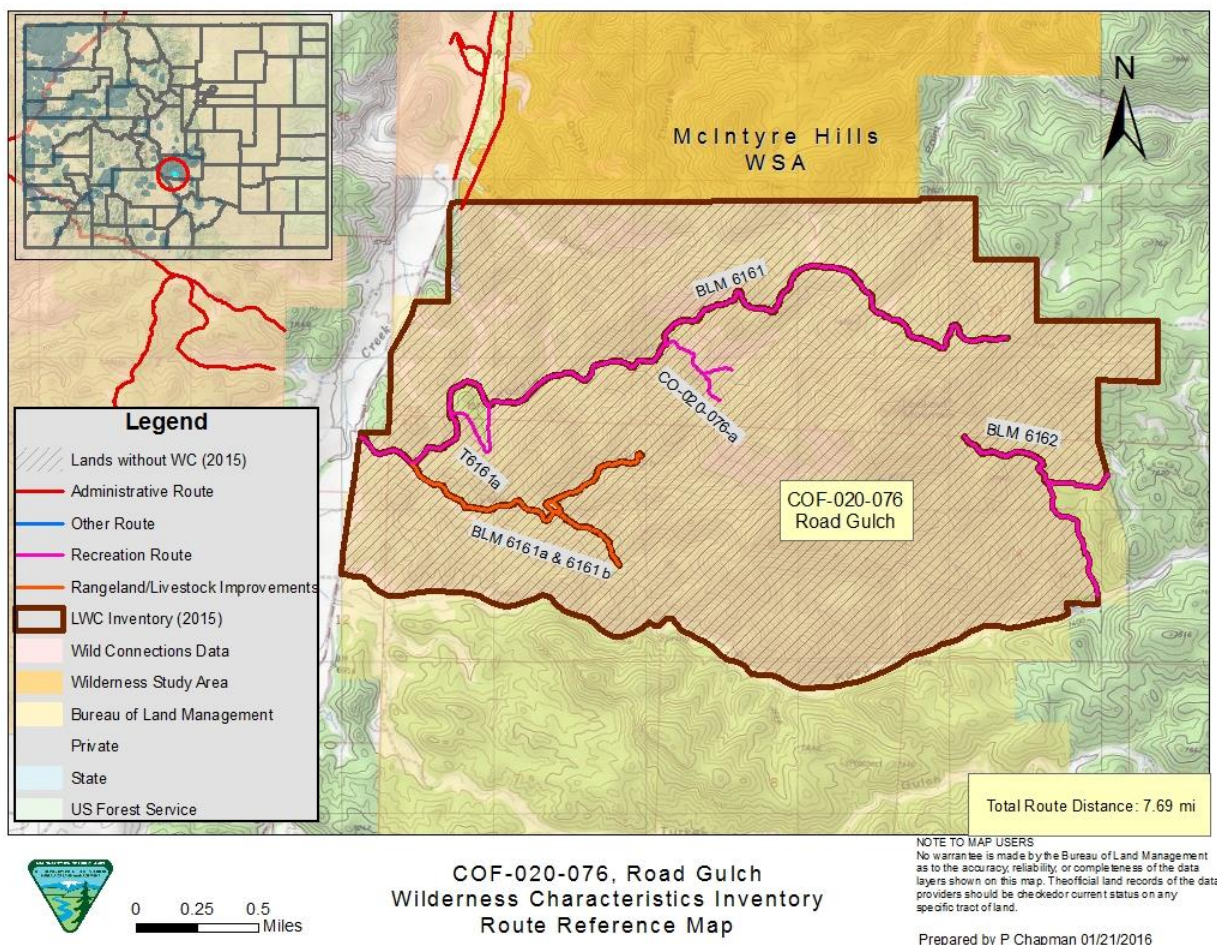
- Colorado State Hwy 69 is a wilderness inventory road and forms the northwest boundary.
- BLM 6161 is a wilderness inventory road, due being on BLM maintenance schedule.

- BLM 6161 A is a wilderness inventory road, due being on BLM maintenance schedule.
- BLM 6161-B is a wilderness inventory road, due being on BLM maintenance schedule.
- Fremont County Road 28 is a wilderness inventory road.
- BLM 6162 is a wilderness inventory road, due being on BLM maintenance schedule.

Evaluator: Janine Prout/ Recreation Assistant

Date: August 27, 2013

**Map 2 Routes within Road Gulch area**



## PHOTO LOG

Photographer(s):

Inventory Area Unique Identifier: **COF-020-076, Road Gulch**

Date	Frame #	Camera Direc.	Description	GPS/UTM Location	Town- ship	Range	Sec.	Photo Point #

**Royal Gorge Field Office Lands with Wilderness Characteristics Inventory, 2015: Evaluation of new information**

**Assessment and Determination**

The BLM Royal Gorge Field Office followed manual 6310 in the performance of inventory for lands with wilderness characteristics. In response to new information submitted in May, 2015 by Wild Connections, the 2013 inventory was re-evaluated. A final review was made by comparing existing data and when needed additional field trips were taken to collect data by GPS, inventory forms, and photo points. Resource specialists were also consulted to determine if the conclusion reached in the 2013 inventory remains valid, or whether changes should occur. The above report documents those findings for the following area(s):


Unit ID	Unit Name	Total BLM acreage inventoried	Acreage with Wilderness Characteristics	Acreage without Wilderness Characteristics
COF-020-076	Road Gulch	3,161.1	0	3,161.1

**Review:**

I have reviewed the inventory results, reports, photos, and maps for the above Lands with Wilderness Characteristics and concur with the findings as submitted.

  
James Kalem Lenard  
Outdoor Recreation Planner, Royal Gorge Field Office

Date: 2/22/16

  
Keith E. Berger  
Field Manager  
Royal Gorge Field Office

Date: 2/24/16